

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF ALABAMA

IN RE: ) CHAPTER 13  
ROBERT JOINTER )  
Debtor(s). ) CASE NO. 17-31119-DHW-13

OBJECTION TO CONFIRMATION

Now comes GUARDIAN CREDIT UNION, by its attorneys, Chambless Math ❖ Carr, P.C., and objects to confirmation of the Debtor's proposed plan and in support thereof states as follows:

1. This creditor has filed a Court Claim #2 in the amount of \$24,123.54 which is secured by one 2013 HYUNDAI GENESIS.

2. The collateral securing the debts of the creditor is grossly undervalued and/or the specified monthly payment is insufficient to provide this creditor with adequate protection against depreciation of its interest over the term of the plan. The plan proposes to value the collateral at \$12,000.00 whereas the NADA retail value is \$20,025.00.

3. The plan fails to provide an appropriate adequate protection payment. An appropriate adequate protection payment amount should be \$220.00 or approximately 1% of the value of the collateral.

4. The plan improperly lists Guardian Credit Union as the creditor for other collateral being paid through the plan.

WHEREFORE, GUARDIAN CREDIT UNION, prays for an Order denying confirmation along with such further relief as the Court may deem proper.

GUARDIAN CREDIT UNION

By: /s/ Leonard N. Math

Of Counsel:  
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served on all attorneys of record as set forth below by electronic notice and/or depositing a copy thereof in the United States mail postage prepaid on this June 14, 2017.

SABRINA L. MCKINNEY  
Chapter 13 Trustee  
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SHINBAUM & CAMPBELL  
PO BOX 201  
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ROBERT JOINTER  
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/s/ Leonard N. Math